

000005362

DRAFT

DRAFT

DRAFT

Mr. Max Dodson
U. S. Environmental Protection Agency

Dear Mr. Dodson:

As required by the Management Requirements: Section A.1 of the current National Pollutant Discharge Elimination System (NPDES) permit for Rocky Flats Plant (RFP), the U. S. Department of Energy (DOE) must notify EPA of changes to the influent to the sewage treatment plant (STP) that may impact effluent quality. DOE identified a non-storm water discharge in its NPDES Storm Water Discharge Application dated October 1, 1992, which is now known to contain some constituents which exceed prospective stream standards for Segment 5 of Big Dry Creek. DOE has halted the release of this water to the environment and intends to add it as an internal waste stream to the sanitary collection system. No impact on discharge quality is anticipated, nor will there be a change in non-limited pollutants requiring a modification of the permit as provided at 40 CFR 122.62.

The non-stormwater in question is discharge from the foundation dewatering process sump for Building 559 (B559). Dewatering is necessary to prevent leakage into an attached tunnel, and to preserve the structural integrity of the building. Chlorinated hydrocarbons have recently been reported in this water, in particular carbon tetrachloride at concentrations of approximately 200 parts per billion (ppb). The total concentration of detected organics is approximately 500 ppb. DOE anticipates that discharge rates will range from 50 to 350 gallons per day.

There has been some question regarding the classification of this water as a hazardous waste. The Colorado Department of Health (CDH), as administrator of the applicable Colorado Hazardous Waste Regulations, has made a determination that this water is not a hazardous waste, based on its origin and the exclusion when discharged to a sanitary collection system. The identified constituents are best treated at the STP as documented by the EPA Risk Reduction Engineering Laboratory. DOE does not view the discharge of foundation drains to the STP as a long term solution, and is pursuing alternative treatment technologies. Immediate use of the STP is justified, however, based on the non-hazardous classification and the compatibility with treatment in plants with activated sludge and anaerobic digestion.

If you have any questions regarding this notification, please contact Jon Dion of my staff at 966-5904.

Sincerely,

A. H. Pauole, Acting Manager
DOE, RFO

cc:

G. W. Baughman
F. R. Dowsett
M. Hestmark
R. D. Shankland

CDH
CDH
EPA
EPA

M. S. Karol
T. E. Lukow
T. G. Hedahl
W. A. Kirby

DOE, RFO
DOE, RFO
EG&G Rocky Flats, Inc.
EG&G Rocky Flats, Inc.